

EXHIBIT 18

FILED IN OPEN COURT
DATE: 3/27/2019
Tayemmar
DEPUTY CLERK

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA : Criminal No. 3:18-CR-00011
:
v. :
:
JAMES ALEX FIELDS :
:
:

STATEMENT OF OFFENSE

The offenses described below occurred within the Western District of Virginia, as well as other districts. This Statement of Offense briefly summarizes the facts and circumstances surrounding the defendant's criminal conduct. It does not contain all of the information obtained during this investigation and applicable to an accurate Presentence Report and Sentencing Guidelines calculation.

This statement of facts is not protected by proffer agreement or any other agreement. Except in the event the attached plea agreement is not approved as contemplated by Paragraph E, Section 1, this statement of facts shall be wholly admissible at trial in the event this plea is later withdrawn, notwithstanding any Rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410, and Federal Rule of Criminal Procedure 11.

Defendant JAMES ALEX FIELDS, JR. ("FIELDS") acknowledges and agrees that, in proving the elements of the crimes to which he is pleading guilty, the United States can establish the following facts beyond a reasonable doubt, and that these facts constitute an adequate basis for his pleas of guilty.

Prior to August 12, 2017, Defendant FIELDS obtained multiple social media accounts, which he used to express his beliefs regarding race, national origin, religion, and other topics. On these accounts, FIELDS expressed and promoted his view that white people are superior to other races and peoples; expressed support of the social and racial policies of Adolf Hitler and Nazi-era Germany, including the Holocaust; and espoused violence against African Americans, Jewish people, and members of other racial, ethnic, and religious groups he perceived to be non-white. FIELDS also expressed these views directly in interactions with individuals known to him.

In or around the spring and summer of 2017, an event referred to as the "Unite the Right" rally was organized and scheduled to occur on August 12, 2017, at Emancipation Park in Charlottesville, Virginia, which is within the Western District of Virginia. This rally was widely

Defendant's Initials: JF

promoted on social media and internet sites associated with white-supremacist individuals and groups, and was scheduled to feature a lineup of well-known white-supremacist speakers.

On or about the afternoon of August 11, 2017, Defendant FIELDS departed Maumee, Ohio, driving his gray Dodge Challenger bearing Ohio license plate GVF-1111, and arrived in Charlottesville, Virginia, in the early morning of August 12, 2017.

On the morning of August 12, 2017, Defendant FIELDS arrived in and around the immediate vicinity of Emancipation Park in Charlottesville, Virginia, to attend the Unite the Right rally. Multiple groups and individuals espousing white-supremacist and other anti-Semitic and racist views also attended the rally. That morning, these rally participants, including FIELDS, engaged in chants promoting or expressing white-supremacist and other racist and anti-Semitic views.

On August 12, 2017, shortly before the scheduled start of the Unite the Right rally, law enforcement declared an "unlawful assembly" and required rally participants, including Defendant FIELDS, to disperse. FIELDS later returned to his vehicle and began to drive on the streets of Charlottesville, Virginia.

On August 12, 2017, Defendant FIELDS drove his car onto Fourth Street, a narrow, downhill, one-way street in downtown Charlottesville. At or around that same time, a racially and ethnically diverse crowd had gathered at the bottom of the hill, at the intersection of Fourth and East Water ("Water") Streets. Many of the individuals in the crowd were celebrating as they were chanting and carrying signs promoting equality and protesting against racial and other forms of discrimination. FIELDS slowly proceeded in his vehicle down Fourth Street toward the crowd and stopped and observed the crowd while idling in his vehicle. With no vehicle behind him, FIELDS then slowly reversed his vehicle back up Fourth Street toward the top of the hill, near the intersection of Fourth and East Market ("Market") Streets.

At or around that same time, the members of the crowd began to walk up Fourth Street from Water Street toward Market Street, populating the streets and sidewalks between the buildings on Fourth Street. Having reversed his car to a point at or near the top of the hill and the intersection of Fourth and Market Streets, Defendant FIELDS stopped his vehicle. FIELDS then rapidly accelerated forward down Fourth Street in his vehicle, running through a stop sign and across a raised pedestrian mall, and drove directly into the crowd. FIELDS's vehicle stopped only when it struck another stopped vehicle near the intersection of Fourth and Water Streets. FIELDS then rapidly reversed his car and fled the scene. As FIELDS drove into and through the crowd, FIELDS struck numerous individuals, killing Heather Heyer (as listed in Count One of the Indictment) and causing bodily injury, or attempting to cause bodily injury using his vehicle, a dangerous weapon, to the following individuals, as listed in Counts Two through Twenty-Nine of the Indictment:

Count Two	M.B.
Count Three	M.M.

Defendant's Initials: JF

Count Four	C.C.
Count Five	T.B.
Count Six	W.B.
Count Seven	N.L.
Count Eight	E.B.
Count Nine	A.M.
Count Ten	N.M.
Count Eleven	C.A.
Count Twelve	N.R.
Count Thirteen	M.A.N.
Count Fourteen	S.S.
Count Fifteen	K.A.
Count Sixteen	C.M.
Count Seventeen	M.R.
Count Eighteen	A.H.
Count Nineteen	K.T.
Count Twenty	S.L.
Count Twenty-One	C.Y.
Count Twenty-Two	L.Q.
Count Twenty-Three	T.W.
Count Twenty-Four	M.W.
Count Twenty-Five	B.H.
Count Twenty-Six	L.S.
Count Twenty-Seven	M.J.
Count Twenty-Eight	A.J.
Count Twenty-Nine	A.R.

Defendant FIELDS drove into the crowd because of the actual or perceived race, color, religion, and/or national origin of individuals in the crowd, and his actions in doing so were willful and included an attempt to kill.

1/3/18
Date

James Fields
James Alex Fields
Defendant

Defendant's Initials: JF

12-31-2018
Date


12-31-2018
Date


3-27-19
Date

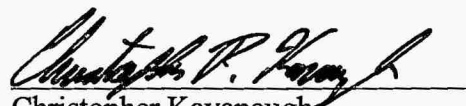
3/27/2019
Date


3/27/19
Date


Frederick T. Heblich, Jr.
Interim Federal Public Defender


Lisa M. Lorish
Assistant Federal Public Defender
Counsel for James Fields


Thomas T. Cullen
United States Attorney


Christopher Kavanaugh
Assistant United States Attorney


Risa Berkower
Rachel Kincaid
Trial Attorneys
Civil Rights Division
U.S. Department of Justice

Defendant's Initials: JF